

**VIA UPS OVERNIGHT DELIVERY**

January 19, 2016

Mr. Robert Buettner, Chief  
Air Compliance Branch  
U.S. Environmental Protection Agency  
Region 2 Office  
290 Broadway, 21<sup>st</sup> Floor  
New York, NY 10007-1866

Re: Information Request, Reference Number: CAA-02-2015-1451

Dear Mr. Buettner:

By this letter and supporting attachments, Covanta Hudson Renewable Energy, LLC ("Covanta Hudson") provides its response to the referenced Clean Air Act Section 114 Information Request ("Information Request") received by Covanta Holding Corporation on November 18, 2014. This response only addresses Parts IIIA and C, because our review has not identified any projects as described in sections B2- B4 of the Information Request which meet criteria in Part III.B section 1.

As you may know, Covanta Hudson operated the Dutchess County Resource Recovery Facility ("Facility") until June 30, 2014. Our response to this Information Request therefore is limited to information that currently is available on the Covanta Holding Corporation corporate network. The Facility is owned by the Dutchess County Resource Recovery Agency. We understand that the current operator of the Facility is Wheelabrator Dutchess County LLC. Both the owner and current operator of the Facility should be consulted for additional information regarding current operations as well as operations during the period of time in which Covanta Hudson was Facility operator.

Covanta Hudson's response includes a self-explanatory "Response Summary" (Microsoft Excel spreadsheet) that also serves as an index to the documents and information provided today. The Response Summary together with all documents is provided on the enclosed USB Flash Drive in a searchable format. Also included on the USB Flash Drive is a copy of this letter and the Certification of Response executed as required by U.S. EPA. The original of the Certification of Response is also provided in hard-copy as an attachment to this letter.

Kindly note that today's response includes Confidential Business Information ("CBI") as defined in 5 U.S.C. 552(b)(4) and U.S. EPA's regulations at 40 C.F.R. Part 2 Subpart B. Documents

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containing CBI are clearly identified with a caption and/or cover sheet stating "COMPANY CONFIDENTIAL BUSINESS INFORMATION, PROPRIETARY/TRADE SECRET - 5 U.S.C. 552(b)(4)."

If you have any questions about this submission, please contact me at 201-264-1698, or Brian Bahor, Vice President – Environmental, Sustainability & Permitting, Covanta Energy Group, LLC, at (862) 345-5113.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard R. Giordano", with a stylized flourish at the end.

Richard R. Giordano  
Vice President – Regional Operations Manager  
NYNJ Metro Region

Enclosures

cc: Victor Tu, U.S. EPA (via e-mail w/o attachments)  
Brian Bahor, Covanta

ATTACHMENT TO ENCLOSURE 1

CERTIFICATION OF RESPONSE

State of NEW YORK:

County of DUTCHESS

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request Letter and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request Letter, I am under an obligation to supplement my response to the Information Request Letter if any additional information relevant to the matters should become known or available to me.

RICHARD R. GIORDANO


NAME (print or type)

V.P. REGIONAL OPERATIONS MANAGER

TITLE (print or type)

  
SIGNATURE

Sworn to before me this 20 day of January, 2016

  
Notary Public

ANNA MARIE BROWN  
Notary Public  
State of New Jersey  
Commission Exp. 12/28/2017